

RAUNDS NEIGHBOURHOOD PLAN 2011-2031

East Northamptonshire Council Consultation Response

Please refer to the plan and policies at http://www.raunds-tc.gov.uk/Neighbourhood_Plan.aspx. Details of how to respond are detailed below. Use additional pages as necessary.

Responses to be sent to:-

EMAIL

The Town Clerk info@raunds-tc.gov.uk

POST

The Town Clerk The Hall, Thorpe Street, Raunds. NN9 6LT

DEADLINE FOR RESPONSES: 14:00, Tuesday, 1st December 2015

General comments

The Plan appears to be bold, imaginative and visionary. In this regard, East Northamptonshire Council is keen to help and support Raunds in its aims to prepare a Neighbourhood Plan for the Parish, in any way that we (as the local planning authority) are able.

Planning Officers have reviewed the policies within the Plan and from a Development Management (DM) point of view there are a number of concerns regarding the “tone” of several policies. The overall view is that many of the policies appear to be excessively restrictive within the context of the National Planning Policy Framework (NPPF) and the requirement for Neighbourhood Plans to “*plan positively to support local development*” (NPPF paragraph 16).

The wording of policies has tended to be very prescriptive and often duplicates things which would already be considered under existing Local Plan development management policies e.g. amenity.

Section 1.0 – Introduction and Background

Comments

Paragraph 1.11 – Minor/ editorial changes – Repeat of paragraph 1.10

Section 3.0 – How long will it take...?

Comments

Paragraph 3.4 – Minor/ editorial changes – All Neighbourhood Plans need to undergo an independent examination, although these are normally conducted through written representations. Therefore, the phrase “...*in all likelihood*...” should be deleted from the 1st sentence.

Paragraph 3.9 (final sentence) – While there is no need for the Neighbourhood Plan to make site allocations for development, it may be better to redraft the final sentence of paragraph 3.9 to ensure that the Plan remains positive; e.g. “*Given the current quantum of development commitments, it is anticipated that any further growth during the Plan period to 2031 would be limited to small scale windfall development.*”

Section 4.0 – Key issues for Raunds

Comments

Paragraph 4.3 – Minor/ editorial changes – Suggested factual revision to paragraph, in the interest of clarity:

“For Raunds, the current adopted strategic Local Plan policies are contained in the following documents:

- *North Northamptonshire Core spatial Strategy, adopted June 2008; and*
- *East Northamptonshire District Local Plan, adopted November 1996 (saved policies).”*

Paragraph 4.5 – Editorial changes/ update, to reflect ENC decisions regarding “strategic” and “non-strategic” policies:

“National planning policy (NPPF paragraph 185) requires that the Neighbourhood Plan should be in general conformity with adopted strategic policies, but should take precedence of existing non-strategic policies. On 16 November 2015, East Northamptonshire Council agreed a distinction between strategic and non-strategic policies, and the Neighbourhood Plan will fit within the framework defined by the strategic policies, but will supersede those deemed to be non-strategic.”

Section 5.0 – Aim and Objectives [“Aims and Objectives?”]

Comments

Overall comment

Apart from the overall vision for the town, *“to enable Raunds to develop as a vibrant, successful, pleasant rural market town; where people feel safe to live”*, it is noted that the focus for the Plan is employment/ economic development.

While the overall objectives are broader, it is appropriate for the Plan to adopt an approach whereby no further development land allocations are proposed given the current quantum of commitments for new residential and employment related development around the town.

Section 6.0 – Raunds Neighbourhood Development Plan Policies and Proposals

Comments

Objective 1 – While there is no requirement for the Neighbourhood Plan to allocate further land for housing, the opportunities for delivering Objective 1 on the basis of small scale windfall developments within the urban area is limited.

Paragraph 6.2 – Minor/ editorial changes – *“...to cater for the demand from smaller households...”*

Paragraph 6.4/ policy R1

Policy R1 focuses upon housing size and types. This is appropriate, given that it provides additional local direction to the overall Joint Core Strategy (JCS) standards set out in Policy 30.

However, it is considered that the 1st and final sentences of Policy R1 are factual information rather than policy direction, so should become supporting text (move to paragraph 6.4). Also, it is advisable to remove specific cross references to JCS paragraphs 9.26 and 9.27, as may well change before that Plan is adopted. It is also advisable to refer simply to “the Local Plan”, in order to “future proof” Policy R1. Suggested amendments are set out below.

Paragraph 6.4: “...both the “affordable” and “market” housing sectors. In recognition of the likely need for smaller dwellings and for the need for flexibility, the Raunds Neighbourhood Plan supports the Local Plan which indicates that, for new developments, a significant proportion (generally at least 70%) of small and medium sized properties (1-3 bedrooms) will be provided. The Neighbourhood Plan also supports Local Plan objectives, to ensure that a balanced housing stock is secured.”

“R1 – ENSURING AN APPROPRIATE RANGE OF SIZES AND TYPES OF HOUSES

Affordable and market housing should be delivered in accordance with the size, mix and tenure standards set out in the Local Plan. Proposals for a higher proportion of larger (4+ bedroom) dwellings should be supported by evidence in relation to the existing housing stock and the local housing market.”

Paragraph 6.9

Paragraph 6.9 is considered to be sound and appropriate. However, it may be helpful to also include a cross reference to Local Plan (JCS) Place Shaping Principles.

The final sentence appears to imply that the Town Council will take over the determination of planning applications. It is suggested that the final sentence be redrafted, as follows: “*These standards provide ‘best practice’ in putting forward detailed proposals. Developers should work closely with East Northamptonshire Council, the Town Council and community groups in ‘place shaping’ future development schemes.*”

Policies R2 and R3

Policies R2 and R3 both include worthy aspirations in the context of setting local design standards. However, it will be necessary to ensure that these are achievable; i.e. that they comply with the current General Permitted Development Order (GPDO). Also, many of the themes covered in policies R2 and R3 are already addressed through the principles set out in adopted CSS Policy 13 and replacement JCS Policy 8 (Place Shaping Principles).

POLICY R4

It is recognised that there is a strong desire to avoid the loss of residential parking. However, in practice it may be difficult to resist the loss of garages and/ or off-street parking, much of which constitutes permitted development rights (GPDO).

Paragraph 6.10

It may be advisable to replace the reference to: “*The latest version of the North Northamptonshire Core Strategy*” with “*The Local Plan*”, to “future-proof” the Neighbourhood Plan.

Paragraph 6.12/ POLICY R5(a) – OPEN SPACE PROVISION

It may be advisable to revise references for East Northampton Council Open Space Supplementary Planning Document, to read: “*East Northampton Council Open Space Supplementary Planning Document (Adopted November 2011) and any subsequent updates or revisions*”, in order to “future-proof the Neighbourhood Plan. Also, it should be noted that there will be few opportunities to apply Policy R5 in practice, as all significant development sites in/ around Raunds are already committed and further development will be limited to small scale and windfall development schemes within the existing urban area.

POLICY R6 – PROTECTED OPEN SPACES

It is noted that the proposed Protected Open Spaces (Figure 5) include land at Smithfield Place (site 24). East Northamptonshire Council, the current landowner, has considered the role of this 0.13ha site and do not consider that it has any significant function as public open space that is worthy of retention. Accordingly, it is argued that this proposed Protected Open Space should be deleted.

POLICY R7 – LOCAL GREEN SPACES IN RAUNDS

“Their development for uses other than uses compatible with their openness will only be permitted in very special circumstances” – What are these “very special circumstances?”. It may be best to adapt NPPF paragraphs 81 and 89 to set out the special circumstances where *“uses other than uses compatible with their openness”* could be permitted. It should also be noted that the detailed assessment for Local Green Spaces (well summarised in Appendix 2) should be clearly published as a key part of the evidence base for the Plan.

POLICY R8

The identification of specific community facilities provides a useful local iteration of the overall approach to the protection of existing facilities set out in adopted CSS Policy 13 and replacement JCS Policy 7. However, it should be noted that material considerations must also conform to national policy (NPPF) and permitted development rights.

Paragraph 6.17

With regard to references to the adopted and replacement Core Strategies, it would be better to refer to the: *“Spatial development strategy set out in the Local Plan, which defines Raunds as being a focal point for development, providing a strong service role for the local community and surrounding rural areas. Development will be directed towards supporting town centre regeneration and the retention of local services.”* [This text provides a summary of the adopted and replacement development strategies for Raunds]

POLICY R9 – DEVELOPMENT IN RAUNDS TOWN CENTRE

Development management criteria are considered to be relevant and appropriate to ensure that town centre development is delivered in an appropriate manner. The final Policy R9 paragraph sets out a 70% A1 retail threshold. This would require further justification, specifically:

- Would this relate to No of units or length of the total ground floor frontage for main town centre uses?
- While it may be appropriate to focus upon the role of retail within the primary shopping area, it must be borne in mind that national policy requires that Local Plans and/ or Neighbourhood Plans should promote competitive town centres that provide customer choice and a diverse retail offer (NPPF paragraph 23).

Having considered Raunds Town Council’s recent Case Study – *“The impact of statutory instrument 296, The Town and Country Planning (General Permitted Development) (England) Order 2015, on the High Street Raunds”*, it is noted that just over 40% of the proposed Primary Shopping Area is currently A1 retail (including vacant units), both in terms of retail frontage length and Nos of units/ businesses. Therefore, it is considered that the proposed 70% threshold is unlikely to be achievable/ deliverable. A focus upon retaining at least 40% retailing within the Primary Shopping Area would be more likely to represent a realistic, deliverable baseline standard. This should be referred to within paragraph 6.19.

Furthermore, it must be questioned whether the narrow focus upon A1 retail uses (over and above other main town centre uses) is appropriate. The NPPF does **not** place a “premium” upon retail at the expense of other main town centre uses, even within Primary Shopping Areas. Instead, it seeks to deliver **competitive** town centres, customer choice and diversity (paragraph 23), with reference to resilience, viability and vitality. The underlying theme of NPPF paragraph 23 (and Planning Practice Guidance) is securing a realistic range of roles and functions for the town centre. It is therefore considered that a focus upon A1 uses alone does not accord with the spirit of the national town centre policies.

Suggested revisions to final section of Policy R9 – “*Within the primary shopping area, as defined by Figure 6 [NB Policy R9 reference to Figure 5 needs to be amended to Figure 6], proposals which lead to the permanent loss of retail units should be supported by evidence to demonstrate that their continued retail use is no longer viable, or that an alternative use would positively enhance the viability and vitality of the town centre.*”

POLICY R10-R12

Policies R10-R12, provide a good indicative list for potential regeneration projects. This may prove to give some transparency for identifying priority projects for the town if/ when Community Infrastructure Levy is introduced (25% of CIL funding arising from new developments within the Parish of Raunds allocated to the Town Council).

Paragraph 6.24

It may be helpful to include a cross reference to East Northamptonshire Council’s Shop Front Design SPD, adopted January 2011: http://www.east-northamptonshire.gov.uk/site/scripts/download_info.php?downloadID=758&fileID=2655. This should complement Policy R11, by providing additional detailed guidance.

POLICY R13 – PROTECTING LOCAL EMPLOYMENT SITES

Local employment sites listed within Policy R13 should be shown on the policies map as zonal designations/ land allocations.

Also, it would be difficult to apply the standards relating to B8 uses, whereby at least 20% of on-site jobs should be office based. In reality, there would always be a significant ancillary element of office jobs forming part of any warehouse or logistics development, although it would not be possible to set a requirement for “ancillary” jobs. It may be appropriate to include reference to B8 development as a source for new ancillary office jobs within the supporting text.

Policy R13 also includes reference to the national (NPPF paragraph 26) threshold for main town centre uses (2500m²), with reference to hotel/ leisure uses. Of all recently consented A1 superstore schemes, only Sainsbury’s, Cattle Market, Market Road, Thrapston (<http://otportalsrv.east-northamptonshire.gov.uk/pap/index.asp?caseref=11/01234/FUL>) at 3341m², would be **above** the national impact test threshold. As part of the emerging Four Towns Plan, the Council is looking to set a **local** threshold for requiring an impact test for main town centre uses. The Council will be able to advise further as this work is taken forward.

With regard to the final section of Policy R13, it is considered that the wording is overly restrictive; i.e. “*approval for uses outside of the above will only be permitted...*”. It may be appropriate to re-word this part of the policy as follows: “*Planning permission for alternative uses to ‘B’ class employment will be permitted, where it could be demonstrated that:*”

Policies R14 and R15

There are no fundamental concerns with either policies R14 or R15, except that these appear to simply restate existing Local Plan policies.

However, Policy R15 refers to developments “*that do not lead to any significant adverse impacts*”. To strengthen the policy, it may be helpful to include specific criteria as to what could be regarded as representing a “significant impact”.

POLICY R16

Policy R16 is generally sound and robust, although it should be noted that there is a potential contradiction with Policy R13, which appears to be seeking the retention of designated Local Employment Sites for ‘B’ class employment uses.

POLICY R17-R18

It is assumed that the green infrastructure network, referred to in Policy R17 will be shown on the overall policies map that should be prepared to accompany the Neighbourhood Plan (“*map x*?”).

While policies R17 and R18 are basically sound, it is unclear how far these offer any additional direction over and above Local Plan Green Infrastructure policies (i.e. CSS Policy 5 and replacement JCS policies 19 and 20).

R19 – LOCALLY LISTED BUILDINGS

It would be useful if the locally listed buildings specified in Policy R19 could be shown on the policies map as points.

Paragraph 6.33/ POLICY R20

Factual correction – The correct name/ title for the Stanwick Lakes SPA/ SSSI is the “Upper Nene Valley Gravel Pits Special Protection Area (SPA)/ Ramsar site”, which is also designated a SSSI and incorporates Stanwick Lakes Country Park. References should be amended accordingly.

POLICY R21 – MOVEMENT AND CONNECTIVITY

It would be useful if the specific projects listed at criteria (d) –(j) are shown on the policies map, as points or linear information, as appropriate.

Paragraph 6.38

It is suggested that the following text be inserted at the beginning of paragraph 6.38: “*Once East Northamptonshire Council formally introduces CIL, the RNDP will enable the Town Council...*”; in order to provide additional clarity.

POLICY R22 – DEVELOPER CONTRIBUTIONS AND COMMUNITY INFRASTRUCTURE LEVY

It may be appropriate to move the specific projects put forward in policies R10-R12, into the final sub-section of section 6.0 (“Developer Contributions and Community Infrastructure Levy”). This would help to clearly demonstrate clearly that CIL will be an important mechanism for delivering individual regeneration projects.

It is also questioned whether Policy R22, as written, is compliant with the relevant CIL Regulations. East Northamptonshire Council will be able to advise further as to any re-drafting that would be needed in order to make the policy compliant with the Regulations.

Overall comments

Overall, the hard work and enthusiasm in taking the Neighbourhood Plan forward must be commended. East Northamptonshire Council officers have considered the draft document and have a number of proposed changes and/ or comments to make regarding certain aspects of the policy text.

Many comments/ proposed changes relate to issues of clarity and ensuring that the wording of policies and/ or supporting text is sufficiently clear. Specific revisions are suggested to policies R1, R7, R9 and R15, to strengthen these or ensure that they are robust and defensible. With particular reference to the Policy R9 A1 70% retail threshold, it is extremely unlikely this could be realistically delivered, given that the Primary Shopping Area currently consists of less than 50% A1 retail uses.

The amount of work that has been done to date is noted, but it is important that East Northamptonshire Council is able to provide appropriate support and assistance as a “critical friend”, to ensure that the Neighbourhood Plan is as clear and robust as it can be.

Appendix 1

It is noted that SEA screening has been included at Appendix 1. Similar screening opinions should be undertaken regarding Habitat Regulations Assessment and Equalities Impact Assessment, using the respective toolkits that are available through East Northamptonshire Council’s Neighbourhood Planning web page: <http://www.east-northamptonshire.gov.uk/neighbourhoodplanning>.

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